

FILED 10 JAN '23 13:18 USDC-ORF

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA

3:23-cr-00011-HZ

v.

INDICTMENT

CARLOS PEREZ-RAMIEREZ,

**21 U.S.C. § 841(a)(1), 841(b)(1)(A),
(b)(1)(B), (b)(1)(C)**

and

18 U.S.C. § 924(c)(1)(A)

OSIRIS AGUILAR,

Forfeiture Allegations

Defendants.

THE GRAND JURY CHARGES:

COUNT 1

**(Possession with the Intent to Distribute Fentanyl)
(21 U.S.C. § 841(a)(1), (b)(1)(A)(vi))**

On or about December 31, 2022, in the District of Oregon, **CARLOS PEREZ-RAMIEREZ**, defendant herein, did knowingly and intentionally possess with the intent to distribute 400 grams or more of a mixture or substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, a Schedule II controlled substance;

In violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A)(vi).

COUNT 2
(Possession with the Intent to Distribute Methamphetamine)
(21 U.S.C. § 841(a)(1), (b)(1)(B)(viii))

On or about December 31, 2022, in the District of Oregon, in the District of Oregon, **CARLOS PEREZ-RAMIEREZ**, defendant herein, did knowingly and intentionally possess with the intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B)(viii).

COUNT 3
(Possession with the Intent to Distribute Heroin)
(21 U.S.C. § 841(a)(1) and (b)(1)(C))

On or about December 31, 2022, in the District of Oregon, in the District of Oregon, **CARLOS PEREZ-RAMIEREZ**, defendant herein, did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance;

In violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 4
(Possession of Firearm in Furtherance of a Drug Trafficking Crime)
(18 U.S.C. § 924(c)(1)(A))

On or about December 31, 2022, in the District of Oregon, **CARLOS PEREZ-RAMIEREZ**, defendant herein, did knowingly possess a firearm to wit: a Springfield Hellcat 9mm handgun , in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is possession with the intent to distribute the controlled substances as alleged in Count 1 of this indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 5
(Possession with the Intent to Distribute Fentanyl)
(21 U.S.C. § 841(a)(1), (b)(1)(A)(vi))

On or about January 1, 2023, in the District of Oregon, **OSIRIS AGUILAR**, defendant herein, did knowingly and intentionally possess with the intent to distribute 400 grams or more of a mixture or substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, a Schedule II controlled substance;

In violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A)(vi).

FIRST FORFEITURE ALLEGATION

Upon conviction of any of the controlled substance offenses as alleged in Counts 1, 2, 3 and 5, of this Indictment **CARLOS PEREZ-RAMIEREZ** and **OSIRIS AGUILAR**, defendants herein, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the said violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of said violations, including but not limited to the following:

A money judgment for a sum of money equal to the amount of property representing the amount of proceeds obtained as a result of the controlled substances distributed as alleged in Counts 1, 2, 3 and 5 for which the defendants are jointly and severally liable.

If any of the above-described forfeitable property, as a result, of any act or omission of the defendants:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;

- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property described above.

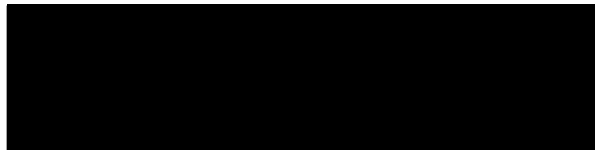
SECOND FORFEITURE ALLEGATION

Upon conviction for the offenses in Count 4 of this indictment, **CARLOS PEREZ-RAMIEREZ**, defendant herein, shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), the firearms and ammunition involved in those offense, including without limitation:

A Springfield Hellcat 9mm handgun bearing serial number BB178151.

Dated January 10, 2023.

A TRUE BILL.



OFFICIATING FOREPERSON

Presented by:

NATALIE K. WIGHT
United States Attorney


KEMP L. STRICKLAND, OSB #96118
Assistant United States Attorney